

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

David Oppenheimer,	)	Case No.: 2:19-cv-3590-BHH
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Michael C. Scarafile, Patricia R. Scarafile,	)	DEFENDANTS' ANSWERS TO LOCAL
Sheila Glover Romanosky, and	)	RULE 26.01 INTERROGATORIES
O'Shaughnessy Real Estate, Inc., d/b/a	)	
Carolina One Real Estate,	)	
	)	
Defendants.	)	

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Defendants Michael C. Scarafile, Patricia R. Scarafile, Sheila Glover Romanosky, and O'Shaughnessy Real Estate, Inc., d/b/a Carolina One Real Estate (hereinafter collectively "Carolina One", answer the Court's Local Civ. Rule 26.01 (D.S.C.) Interrogatories as follows:

**(A) State the full name, address, and telephone number of all persons or legal entities who may have subrogation interest in each claim and state the basis and extent of that interest.**

ANSWER: Carolina One is not aware of any parties that have a subrogation interest in the asserted claims.

**(B) As to each claim, state whether it should be tried jury or nonjury and why.**

ANSWER: Plaintiff asserts a claim of copyright infringement and seeks actual and statutory damages; therefore, this matter should be tried by a jury.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.**

ANSWER: Carolina One is a privately-owned company. There is no parent corporation; nor is there a publicly held corporation that owns ten percent (10%) or more of Carolina One's stock. Carolina One is not the parent of any publicly owned company. Carolina One does not own ten percent (10%) or more of the outstanding shares of any publicly owned company.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

ANSWER: Carolina One does not challenge the appropriateness of the division in which the claim was filed.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same**

**or identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

ANSWER: This action is not related to any other matter filed in this District.

**(F) [Defendants only.] If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

ANSWER: Carolina One has been properly identified.

**(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the other party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

ANSWER: Carolina One is not aware of any such legal person or legal entity at this time. Carolina One reserves the right to amend this response should additional information become known.

(SIGNATURE PAGE TO FOLLOW)

Respectfully submitted this 25<sup>th</sup> day of November 2020 in Charleston, South Carolina.

By: /s/ Megan Caroline Moody, Esquire  
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